26 March 2007

SUBJECT; Comments on RM-11306, ex-Parte filing of Feb 14, and Erratum filed 22 March 2007

To whom it may Concern,

As a member of the ARRL, I can attest that the ARRL did not petition the majority of its membership for comments regarding the content within RM-11306 ex-Parte filing of February 14th and the Erratum filed on March 22 prior to submission to the FCC. If they were to have done so, they would have encountered much opposition within the ARRL community. Instead, and in avoiding such internal opposition, the ARRL filed the RM-11306 ex-Parte and the subsequent Erratum sight unseen by the majority of its membership, thus using the FCC as the arbitrator in this matter. This is a blatant waste of your time and budget as these issues could have been internally resolved prior to any filing. Please review this ARRL member's opposing comments below.

I am adamantly OPPOSED to both the ARRL Proposal RM-11306 ex-Parte filing of Feb 14, and also to the "Erratum" filed on March 22 in their entirety. The ARRL does not represent the interests of this Amateur Operator on these issues.

I am all in favor of experimentation in all fields of the Amateur Service, and of the development of new Digital Modes. This is one of the greatest aspects of the hobby as a whole. However, to impose restrictive bandwidth regulations on popular existing Voice modes on 10 meters and VHF in order to benefit a new mode's parameters/operation is not conducive to the future and well being of the Amateur Service. No bandwidth regulation changes need to be implemented. I believe that this will severely hamper experimentation in the existing modes.

This proceeding, if enacted, would also be very difficult and rather expensive to enforce. Bandwidth measurements by distant stations are nearly impossible to accomplish with true accuracy due to a variety of factors; mainly the lack of laboratory grade measurement equipment within the amateur community. This will cause an entirely new class of complaints that must be dealt with by an already understaffed and budget restrained FCC. This new class of complaints will be for "Perceived Bandwidth Violations", and will ultimately result in much consternation within the Amateur Radio Community.

The proposed proceeding also permits operation of Robotic type stations through out the Amateur Bands with no provision to provide protection against either on-frequency or adjacent frequency operation by other stations. The effect will be "harmful interference" to ongoing communications that were occupying the frequency first. Autonomous Digital and Manual Analog signals in the same sub-section of the Amateur Bands are just plain incompatible. To alleviate these "harmful interference" possibilities, Pactor and Winlink need to be segregated to there own sub-section of the Amateur Bands.

I am also opposed to allowing 100Khz wideband OFDM and QAM right in the middle of the current coordinated repeater sub-bands on 2 meters. Again, "harmful interference" to existing on going communications would be the ultimate result of such a proposal if approved. An alternative

band location, one that would minimize if not prevent “harmful interference”, should be investigated for such operations. The onus for such an investigation should fall upon the ARRL and its membership as a whole.

Again, I am adamantly OPPOSED to both the ARRL Proposal RM-11306 ex-Parte filing of Feb 14, and also to the "Erratum" filed on March 22 in their entirety. I feel that RM-11306 needs to be completely denied. I also believe that the ARRL needs to receive push back from the FCC when filing proposals that have not been ratified by the ARRL membership as a whole. To file such controversial proposals without proper ratification from its membership as a whole is a burden on the FCC both monetarily and in man-hours.

Sincerely,

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